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**Tucson Electric Power Com.,****4350 East Irvington, Post Office Box 711  
Tucson, Arizona 85702**

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Ernest Johnson, Esq.  
Director, Utilities Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, AZ 85007

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Re: TEP Code of Conduct Modification, Decision No. 65154, Docket No. E-00000A-02-0051

Dear Mr. Johnson:

E-00000A-02-0051  
E-01345A-01-0822  
E-00000A-01-0630  
E-01933A-02-0069

In Decision No. 65154, the Commission ordered Tucson Electric Power Company (TEP) to file modifications to its Code of Conduct "as recommended by Staff." Staff has recommended modifications to the existing codes of conduct to cover investor-owned electric utilities regulated by the Commission and "all affiliates in energy-related fields."

Neither TEP nor its parent, UniSource Energy, has a competitive electric service provider, a separate generation affiliate or an affiliate involved in the marketing and trading of wholesale power. Moreover, the interests of Arizona consumers with respect to TEP's wholesale energy sales and procurement currently are protected by TEP's existing Commission-approved Code of Conduct and accompanying Policies and Procedures as well as by the Commission's Public Utility Holding Companies and Affiliated Interest Rules, Rule R14-2-1616 of the Commission's Retail Electric Competition Rules and the FERC Rules of Conduct.

Thus, at this time, no modifications to TEP's Code of Conduct are necessary. In the event either TEP or UniSource Energy develops or acquires a competitive electric affiliate, TEP will reexamine and reassess the need to make modifications to its Codes of Conduct as contemplated by Decision No. 65154.

If you have questions or comments, please contact me at 520-745-3422.

Respectfully submitted,

David Couture  
Director, Regulatory Affairs  
Tucson Electric Power Company

Cc: Patrick Williams  
Docket Control (original and ten copies)  
Jason Musgrove